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December 14, 2022

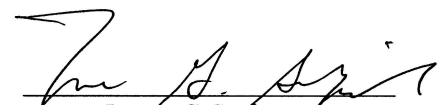
If Defendants seek to maintain any of the exhibits to the declaration at Dkt. No. 286 under seal, Defendants shall file a letter motion by December 23, 2022, and otherwise the documents may be unsealed.

VIA ECF

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

So Ordered.

Dated: December 21, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):  
Request to File Under Seal

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation ("Plaintiff"), in accordance with Paragraph I.D.3 of Your Honor's Individual Rules, to request leave to file under seal Exhibits A-F to the Declaration of JD Colavecchio in Support of Plaintiff's Pretrial Memorandum of Law ("Colavecchio Decl.") (collectively, the "Exhibits"). Parties and attorneys of record who should have access to the sealed documents are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the "Confidentiality Order"). The Exhibits and Motion contain Confidential Information or Discovery Material, as defined in the Confidentiality Order, including excerpts of deposition testimony and materials produced by Defendants in this case.

Pursuant to Paragraph I.D.3 of Your Honor's Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Exhibits and Motion and, therefore, absent objection by Defendants, would propose to file the Exhibits and Motion on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

The Honorable Lorna G. Schofield, p. 2

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)

The Honorable Lorna G. Schofield, p. 3

**Appendix A – Parties and Attorneys of Record**

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

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